Daiichi Sankyo Methodology for Disclosure of Transfer of Value

CONTENTS

I. General 2

1. Cross Border Payments 2
2. Currency 2
3. Added value tax 2
4. Co-marketing projects 2
5. Reporting date 2
6. Intermediaries 3

II. Data Privacy 3

1. Informed consent 3
2. Partial consent 3

III. Reporting categories 3

IV. Research and development 4

1. Definition 4
2. Composition of R&D transfer of value 4

I. GENERAL

1. Cross Border Payments

All disclosures are made in the country in which the HCP practices or in which the HCO is located.

Daiichi Sankyo Nordics is an affiliate of Daiichi Sankyo. Our European Headquarter Daiichi Sankyo Europe GmbH is placed in Munich, Germany. As such we publish only transfer of value to HCOs and HCPs based in European countries other than those where Daiichi Sankyo has established organizations.

2. Currency

Where payments were made in a currency other local currency the exchange rate to local currency will vary according to the date on which the conversion calculation was made. For general purposes, the conversion date should be regarded as the average monthly exchange rate when the event took place.

3. Added value tax

All values provided in our report are net values, i.e. do not include value added tax.

4. Co-marketing projects

Where Daiichi Sankyo jointly markets a product with another pharmaceutical company, Daiichi Sankyo will only declare those payments made directly from Daiichi Sankyo bank accounts or by Daiichi Sankyo employees and listed in the company records as part of its normal business operations. Transfers of value made by its comarketing partners will be disclosed separately by those organizations.

5. Reporting date

Daiichi Sankyo will disclose the details of the payment on the date the transfer of value to HCPs/HCOs is actually made. This may mean that some projects taking place at the end of 2020 will be disclosed as part of the next annual reporting period because the payment may not occur until January when the invoice has been received and settled.

6. Intermediaries

6.1 Intermediaries acting on behalf of Daiichi Sankyo

All intermediary (third parties) that represent or act on behalf of Daiichi Sankyo, are subject to written contract and are obliged to provide Daiichi Sankyo with any contribution made to HCP or HCO. If this information cannot be provided due to the nature of the contribution (e.g. market research), it is in intermediaries responsibility to disclose the costs of contributions.

6.2 Intermediaries acting on behalf of HCO/HCP

Where the intermediary is a professional conference organizer (PCO), Daiichi Sankyo declares the Transfers of Value in the appropriate category in the name of the sponsored HCO/HCP.

6.3 Private companies and associated charities

The payment received by the contracting entity – which may be an HCP, a legal entity owned by a HCP (which is then a HCO) or a HCO – will be disclosed as a Transfer of Value made to that entity.

II. DATA PRIVACY

1. Informed consent

Data Privacy law requires that Daiichi Sankyo obtain permission from individual HCPs prior to disclosing personal data such as individual transfers of value. Daiichi Sankyo has made every effort to secure and retain a record of the necessary permissions.

Where permission has not been obtained or where the individual HCP has refused permission, Daiichi Sankyo has declared the total spend as an aggregate figure within the relevant disclosure category.

2. Partial consent

Where only partial permissions has been granted to disclose transfer of value by an HCP, the entire transfer of value to this particular HCP is disclosed as aggregate.

III. REPORTING CATEGORIES

According to EFPIA Guidance and country local disclosure code Travel and accommodation expenses related to advisory boards and other consulting meetings are published under “Fee for service and consultancy”

IV. RESEARCH AND DEVELOPMENT

1. Definition

Transfers of Value to HCPs or HCOs related to the planning or conduct of (i) non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); (ii) clinical trials (as defined in Directive 2001/20/EC); or (iii) non-interventional studies (NIS) that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study. Non-interventional studies retrospective in nature follow the same disclosure process as HCP honoraria/service fees at the latest from the 2018 reporting period (reported in calendar year 2019). The disclosure of such transfers of value on an individual HCP basis is subject to obtaining HCP´s informed consent as per country specific local requirements. In case the transfers of value for prospective and retrospective NIS cannot be distinguished, the disclosure of transfers of value will be made on an individual HCP basis (HCP´s consent required) and therefore follows the same process as for retrospective NIS.

2. Composition of R&D transfer of value

The aggregate R&D transfer of value includes:

- Contribution to costs of Investigator Meetings and Committees
- Investigator fees for patient visits paid directly to clinical trial site staff or to CROs as an intermediary. Delayed or preliminary payments by CROs to clinical trial site staff are not considered

The aggregate R&D transfer of value does not include fees paid to Clinical Research Organizations (CROs).